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JAN 28 2020

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January 24, 2020

BY ECF

Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Heleen Mees v. City of New York, et al., 19 Civ. 7346 (AJN) (KNF)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York and attorney for Defendant City of New York.¹ In that capacity, I write jointly with Elizabeth Norris Krasnow, counsel for Co-Defendants Manhattan District Attorney's Office, Cyrus R. Vance Jr., Nitin Savur, Jeanine Launay, and Samantha Schott, to respectfully request a brief enlargement of time from February 3, 2020 until February 14, 2020 to file their opposition to Plaintiff's motion for reconsideration filed on January 20, 2020. See Docket Entry No. 49. This is the first request for an enlargement of time to for Defendants to file their joint opposition to Plaintiff's motion for reconsideration. Plaintiff consents to this request.

By way of Background, on December 23, 2019, Plaintiff filed a motion with the Court seeking leave to file a late notice of claim. See Civil Docket Entry Nos. 38-40. On January 6, 2020, Defendants jointly opposed Plaintiff's motion. See Civil Docket Entry No. 41. On January 8, 2020, the Court denied Plaintiff's motion seeking leave to file a late notice of claim and in that Order advised that Plaintiff was restricted from alleging any state law tort claims in the amended complaint. See Docket Entry No. 43. On January 10, 2020, Plaintiff filed her First Amended Complaint ("FAC"). See Docket Entry No. 45. On January 16, 2020, Defendants filed a letter with the Court, with Plaintiff's consent, which proposed a new briefing

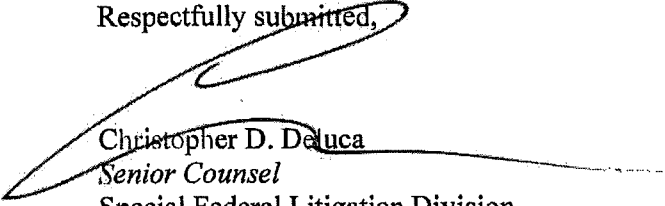
¹ This case is currently assigned to Assistant Corporation Counsel, William Gosling, who is a member of the New York State Bar and is presently awaiting admission to the federal judiciary. Mr. Gosling is handling this matter under my supervision and can be reached at (212) 356-2384 or wgosling@law.nyc.gov

schedule, sought permission to file a joint motion, and requested additional pages for the memorandum of law. See Docket Entry No. 47. The Court so-ordered the proposed briefing schedule and granted that application. See Docket Entry No. 48. Plaintiff, without any notice to Defendants, filed the current motion for reconsideration on January 20, 2020. See Docket Entry No. 49.

Pursuant to Local Civil Rules 6.1 and 6.3, any opposition to a motion for reconsideration is due fourteen (14) days after the motion is served, thus making Defendants' opposition to Plaintiff's motion due on February 3, 2020. Due to other court deadlines, Defendants respectfully request a brief enlargement of time from February 3, 2020 until February 14, 2020 to file their joint opposition to Plaintiff's motion for reconsideration.

Thank you for your consideration of this matter.

Respectfully submitted,

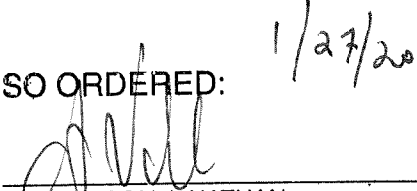

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Defendants' request is hereby granted. Defendants' opposition is due on February 14, 2020. Plaintiff's reply is due on February 28, 2020.
SO ORDERED.

SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE